



**MOTORCYCLE
INDUSTRY
COUNCIL®**



February 20, 2025

Senate Committee on Education, Energy, and the Environment Committee
11 Bladen St
Miller Senate Office Building
Annapolis, MD 21401

Re: MIC, SVIA, and ROHVA Oppose EPR Applicability to Powersports: SB 901

Dear Chair Feldman and Members of the Committee:

The Motorcycle Industry Council (MIC)¹, the Specialty Vehicle Institute of America (SVIA)², and the Recreational Off-Highway Vehicle Association (ROHVA)³ represent several hundred companies in the powersports industry. MIC, SVIA, and ROHVA oppose the applicability of extended producer responsibility (EPR)-related requirements to powersports products, including motorcycles, off-highway vehicles (OHVs), EV batteries, replacement parts, accessories, and protective gear and clothing.

Many powersports dealers and retailers are small businesses who can ill afford increased cost and regulatory requirements. Erecting additional barriers and cost requirements through legislation only serves to create an environment for powersports businesses where options become more limited to respond to economic challenges. Ultimately, when the cost of doing business increases, it hurts everyone – consumers, manufacturers/distributors, and dealers – and Maryland residents will likely seek alternatives such as purchasing from neighboring states/communities where goods won't be subject to expensive compliance costs.

SB 901 would implement EPR-related requirements for packaging. MIC, SVIA, and ROHVA urge caution when seeking to implement a similar program in Maryland. It remains unclear what the financial responsibility of our member companies will be as the few programs that are currently required by law are still in their implementation phases. Our concern is that the costs of these programs will be significantly higher than what may have been predicted. We urge you to take an incremental approach and limit any new programs only to producers that have the largest footprint through online retailers and not apply any requirements to powersports products, which are relatively lower volume, durable goods.

¹ The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing several hundred manufacturers, distributors, dealers and retailers of motorcycles, scooters, motorcycle parts, accessories and related goods, and allied trades.

² The Specialty Vehicle Institute of America (SVIA) is the national not-for-profit trade association representing manufacturers and distributors of all-terrain vehicles (ATVs) in the United States. SVIA's primary goal is to promote safe and responsible use of ATVs.

³ The Recreational Off-Highway Vehicle Association (ROHVA) is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. More information on the standard can be found at <https://rohva.org/ansi-standard/>.

Thank you for your consideration of these comments. Should you have any questions, please do not hesitate to contact me at sschloegel@MIC.org or 703-446-0444 x 3202.

Sincerely,



Scott P. Schloegel
Senior Vice President, Government Relations

Cc: Sen. Sara Love